

NOE PARAMO CASTANEDA
- Plaintiff -

CASE NO.

VERSUS

JUDGE 4-23CV-506-0

AGENT GREG A. JONES
DRUG ENFORCEMENT AGENCY
- Defendant -

MAGISTRATE JUDGE

COMPLAINT

BY PRISONER UNDER 28 U.S.C. '1331 OR BIVENS V. SIX UNKNOWN NAMED
AGENTS OF THE FEDERAL BUREAU OF NARCOTICS, 403 U.S. 388 (1971)

I. Previous Lawsuits

- a. Have you begun any other lawsuit while incarcerated or detained in any facility?
Yes ☒ No ☐
- b. If your answer to the preceding question is "Yes," provide the following information.
 1. State the court(s) where each lawsuit was filed (if federal, identify the District, if state court, identify the county of parish):
Tarrant County Criminal Court
 2. Name the parties to the previous lawsuit(s):
Plaintiffs: Noe Paramo Castaneda
Defendants: Greg A. Jones
 3. Docket number(s): NO. 141-335884-22
 4. Date(s) on which each lawsuit was filed: September 01, 2022
 5. Disposition and date thereof [For example, was the case dismissed and when? Was it appealed and by whom (plaintiff or defendant)? Is the case still pending?]:
Pending; no response has been received from the court
- c. Have you filed any lawsuit or appeal in any federal district court or appeals court which has been dismissed?
Yes ☐ No ☒

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If your answer to the preceding question is "Yes," state the court(s) which dismissed the case, the civil action number(s), and the reasons for dismissal (e.g., failure to state a claim, defendants immune from relief sought, etc.).

II. a. Name of institution and address of current place of confinement:

Oakdale FCI-2, P.O. Box 5010, Oakdale, LA. 71463

b. Is there a prison grievance procedure in this institution?

Yes ☒ No ☐

1. Did you file an administrative grievance based upon the same facts which form the basis of this lawsuit? Yes ☐ No ☒

If "Yes," what is the Administrative Remedy Procedure number?

2. If you did not file an administrative grievance, explain why you have not done so.

Exhaustion with the Administrative Grievance Process of
the Federal Bureau of Prisons would be futile.

3. If you filed an administrative grievance, answer the following question. What specific steps of the prison procedure did you take and what was the result? (For example, for state prisoners in the custody of the Department of Public Safety and Corrections: did you appeal any adverse decision through to Step 3 of the administrative grievance procedure by appealing to the Secretary of the Louisiana Department of Public Safety and Corrections? For federal prisoners: did you appeal any adverse decision from the warden to the Regional Director for the Federal Bureau of Prisons, or did you make a claim under the Federal Tort Claims Act?
-
-

Attach a copy of each prison response and/or decision rendered in the administrative proceeding.

III. Parties to Current Lawsuit:

a. Name of Plaintiff: Noe Paramo Castaneda

b. Defendant, Officer Gregory A. Jones, is employed as
DEA Taskforce Officer at 10160 Technology Blvd. E. Dallas,
Texas 75220

Defendant; _____, is employed as

_____ at _____

Defendant, _____, is employed as

_____ at _____

Additional defendants: Unknown Drug Enforcement agent, Dallas Field
Division, 10160, Technology Blvd. E. Dallas , TX. 75220

IV. Statement of Claim

State the **FACTS** of your case. Specifically describe the involvement and actions of each named defendant. Include the names of all persons involved in the incident(s) or condition(s) giving rise to the lawsuit, and the dates upon which and the places where the incident(s) and/or condition(s) occurred. **YOU ARE REQUIRED TO SET FORTH ONLY FACTUAL ALLEGATIONS. YOU ARE NOT REQUIRED TO SET FORTH LEGAL THEORIES OR ARGUMENTS.**

On or about November 12, 2018, through December 04, 2018, Officer

Greg A. Jones and others, unknown agents of the DEA, did confide, conspire and

orchestrated a false criminal investigation. On December 05, 2018, filed a

false statement in an affidavit, in wanton disregard for the truth, to

obtain a false search and seizure warrant in a state court, without justi-

fiable legal means to execute a search on the Plaintiff's residence, using

deadly force against the Plaintiff causing serious bodily harm, humiliation,

mental suffering and false imprisonment... (See Memorandum in support attached).

V. Relief

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State exactly what you want the court to provide to you or do for you. Make no legal arguments. Cite no cases or statutes.

Plaintiff respectfully moves this Honorable District Court to dismiss the
case against him. Plaintiff also seeks recovery for humiliation, physical and
mental suffering, permanent health consequences from the Agent's illegal
and unconscionable conduct. Plaintiff also seeks compensatory and punitive
damages...

VI. Plaintiff's Declaration

- a. I understand that if I am transferred or released, I must apprise the Court of my address, and my failure to do so may result in this complaint being dismissed.
- b. I understand that I may not proceed without prepayment of costs if I have filed three lawsuits and/or appeals that were dismissed on grounds that the action and/or appeal was frivolous or malicious, or failed to state a claim upon which relief may be granted, unless I am in imminent danger of serious physical injury.
- c. If I am located in a prison participating in the Electronic Filing Pilot Program, I consent to receive orders, notices and judgments by Notice of Electronic Filing.

Signed this _____ day of _____, 2023.

Oakdale FCI-2,
Prisoner no. (Louisiana Department of
Corrections or Federal Bureau of
Prisons

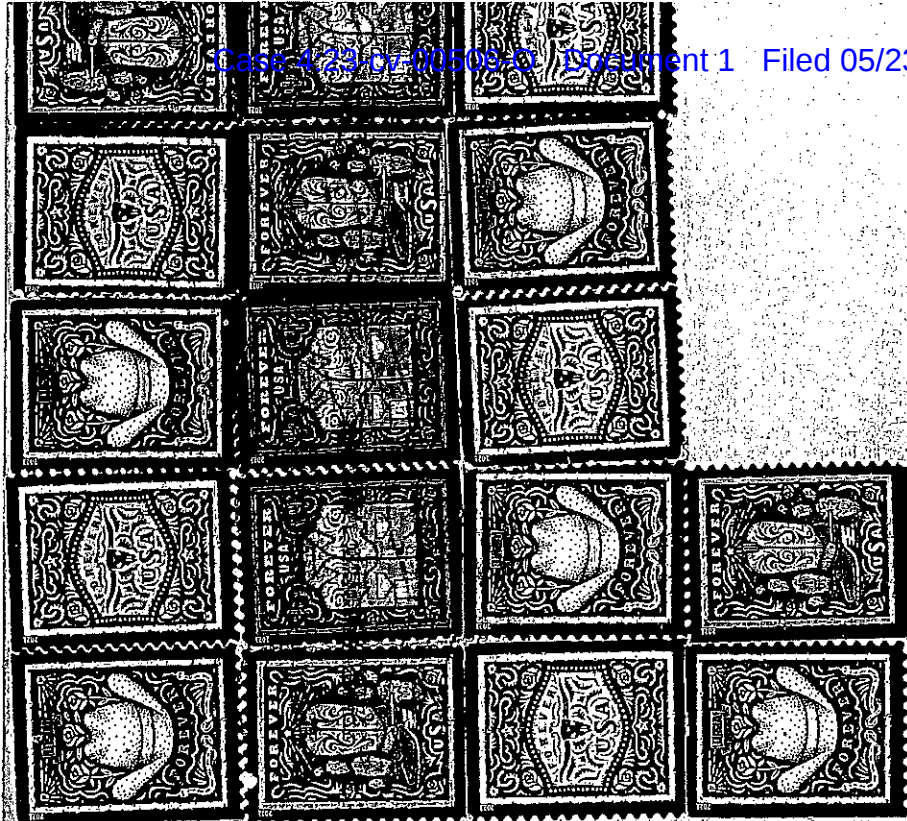
Noe Paramo . C
Signature of Plaintiff

CERTIFIED MAIL®



7021 0350 0000 2937 8182

FROM: NIOE PARAMO-CASTALIEDA
REG. NO. 58093-177
OAKDALE FCJ, 2
P.O. BOX 5010
OAKDALE LA 71463



RECEIVED

MAY 23 2023

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

TO: THE CLERK

U.S. DISTRICT COURT

501 WEST TENTH ST., ROOM

FORT WORTH, TX. 76102

X-RAY